

REMARKS

Claims 1-26 are currently pending. By this amendment after final, claim 2 will be cancelled and its corresponding limitation will be added to independent claims 1 and 12. Thus independent claim 1 now has the exact same limitations as was previously presented in dependent claim 2.

Claims 1, 2, 4, 12, 16, 25, and 26 stand rejected under 35 U.S.C. §102(b) as being anticipated by the Giuhat patent (USP 5,881,145). This rejection is traversed. The following discussion describes how the Giuhat patent is directed to a signaling transfer point (STP) with extra software, and how the Giuhat patent describes that the STP is an addressable endpoint in an SS7 network. The following discussion also describes how STPs are known in the art to be addressable endpoints in the SS7 network. Finally, the following discussion describes how the claimed ICP Platform is a non-terminating, invisible node, which is patentably distinct from the STP of the Giuhat patent.

1. The Giuhat patent is directed to an addressable STP

The Giuhat patent describes a "Signalling Mediation Server", or "SMP", which is an STP with extra software:

Access to the TELCO network is controlled or mediated by a Signalling Mediation Server 68. In Advanced Intelligent Networks, the Signalling Mediation Server, which is also known as a Signalling Mediation Point (SMP), comprises, in essence, a *Signal Transfer Point* provided with Mediated Access software. col. 5, lns. 41-48. (emphasis added).

The Giuhat patent describes how the SMP 68 is used for redirecting a call to a number for one network node to a node with a different, ported number. This is done by having a node in the network that is handling the call send a TCAP message to the SMP 68 for instructions as to how to complete the call processing. The SMP 68 responds to the TCAP message by sending a message with a ported number for the new node. Col. 8, lines 45-61. Thus, the SMP of the Giuhat patent is an addressable signal transfer *point*, for receiving messages in the SS7 network and responding to those messages.

2. STPs are addressable, terminating endpoints in the SS7 network

Signaling Transfer Points (STPs) are standard nodes, and are known in the art to have "point codes." Newton's Telecom Dictionary (19th edition) defines the following terms, which are helpful in understanding signaling points in general, and STPs in particular:

Signaling Point Code: A binary code uniquely identifying a SS7 signaling point in a signaling network. This code is used, according to its position in the label, either as a destination point code or as originating point code.

Signaling System 7 Software Layers: MTP (Message Transfer Part) layers 1 through 3: These layers provide complete lower level functionality at the Physical, Data Link, and Network

Level. They service as a signaling transfer point and support multiple congestion priority, message discrimination, distribution, and routing.

The Wikipedia online encyclopedia further defines the term "point code" as follows:

A SS7 point code is the equivalent of an IP address in an IP network. It is a unique address for a node (Signaling Point, or SP), used in MTP layer 3 to identify the destination of a message signal unit (MSU). http://en.wikipedia.org/wiki/Point_Code

3. The claimed ICP is an invisible, non-terminating node

As discussed above, the STP being described in the Giuhat patent is an addressable terminating endpoint and is a visible node on the SS7 network. The STP is not "invisible", as that term is defined and used by the present patent specification.

The first paragraph of the detailed description of the present patent specification states that "the ICP Platform is not an end point in the network, but rather an invisible node that sits in front of a Signaling End Point (SEP), which may be, for example, a Signaling Transfer Point (STP)" Paragraph [0011], as published. See also, paragraphs [0024] and [0035] of the published application. "All SS7 data links 14 are routed into the ICP Platform 200 and are then routed out to the SS7 network." Paragraph [0024]. Thus, the ICP Platform is invisible at the network layer, which is MTP3 in SS7 (the same layer for point codes in SS7).

Claim 1 describes "a non-terminating intelligent communications platform (ICP) connected between two signaling end points (SEPs) to intercept signaling system 7 (SS7) messages between the two SEPs, wherein the ICP is an invisible node." Thus, it is respectfully submitted that claim 1 distinguishes over the prior art, and is thus in condition for allowance.

Furthermore, claim 12 and the currently rejected dependent claims further limit their respective independent claims, and are also deemed to be in condition for allowance.

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Respectfully submitted,



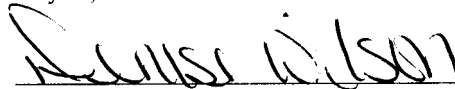
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